

**FABIAN VANCOTT**  
TREVOR WAITE, ESQ.  
Nevada Bar #13779  
411 E. Bonneville Ave., Ste. 400  
Las Vegas, Nevada 89101  
(702) 233-4444  
[dssexton@fabianvancott.com](mailto:dssexton@fabianvancott.com)  
*Attorneys for Defendant Fidelity Life*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ESTATE OF JENNIFER LOUISE  
TASCHEK; MICHAEL HUERTA, a  
personal representative of JENNIFER  
LOUISE TASCHEK; and MICHAEL  
HUERTA, an individual;

Plaintiffs,

vs.

FIDELITY LIFE ASSOCIATION d/b/a  
FIDELITY LIFE; DOES I-X and ROES I-X,

Defendants.

CASE NO.: 2:23-cv-00280-JCM-EJY

**STIPULATION AND ORDER TO  
EXTEND DISPOSITIVE MOTION  
DEADLINES**

**(Third Request)**

IT IS HEREBY STIPULATED by and between Defendant FIDELITY LIFE ASSOCIATION ("Defendant"), by and through its counsel of record, Fabian VanCott and Plaintiff MICHAEL HUERTA ("Plaintiff"), by and through his counsel Mullins and Trenchak, hereby stipulate and agree as follows:

1. On April 18, 2023, the Court entered an Order granting the Stipulated Discovery Plan and Scheduling Order submitted by the parties. ECF No. 13.

2. The Court entered an Order granting the First Stipulation to extend the discovery and dispositive motion deadlines on July 24, 2023. ECF No. 17.

3. The Court entered an Order granting the Second Stipulation to extend the discovery and dispositive motion deadlines on December 13, 2023. ECF No. 22.

4. The parties have continued engage in settlement discussions with the hopes

of a global resolution, and thereby stipulate and agree to extend the dispositive motion deadline seven (7) days to allow the parties sufficient time to attempt a global resolution.

**DISCOVERY COMPLETED/STATEMENT OF DISCOVERY REMAINING**

The parties have completed discovery.

~~**PROPOSED SCHEDULE**~~

The parties stipulate and agree that:

1. **Dispositive Motions:** The parties shall have through and including **January 16, 2024**, to file dispositive motions, which is more 30 days after the discovery deadline.

2. **Pre-Trial Order:** If no dispositive motions are filed, the Joint Pretrial Order shall be filed thirty (30) days after the date set for the filing of dispositive motions. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after decision on the dispositive motions or by further order of the Court.

This stipulation and order is sought in good faith and not for the purpose of delay.

DATED this 8<sup>th</sup> day of January 2024.

LAW OFFICE OF  
MULLINS & TRENCHAK  
/s/ Philip J. Trenchak, Esq  
Philip J. Trenchak, Esq., Bar No. 9924  
1614 S. Maryland Parkway  
Las Vegas, Nevada 89104  
*Attorney for Plaintiff*

FABIAN VANCOTT  
/s/ Trevor Waite  
Trevor Waite, Esq.  
Nevada State Bar No. 13779  
FABIAN VANCOTT  
411 E. Bonneville Ave., Suite 400  
LV, NV 89101  
*Attorney for Defendant*

**ORDER**

IT IS SO ORDERED January 12, 2024.

  
United States Magistrate Judge